

REMARKS/ARGUMENT

Claims 1 through 18 are pending in the present application and have been examined. The Office Action rejected claims 1 through 14 and 16 through 18 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,208,698 (“Ohira”). In addition, the Office Action rejected claim 15 under 35 U.S.C. 103(a) as being unpatentable over Ohira in view of U.S. Patent No. 6,243,421 (“Nakajima”).

The Applicant has amended claims 1 and 9 to correct errors in English grammar and usage, as well as to set forth more explicitly certain limitations that had had already been included in the claims prior to their amendment. These amendments have not, in any way, narrowed the scope of the amended claims. Attached hereto as Appendix A is a marked-up version of the changes made to the claims, captioned “Version with markings to show changes made.”

In light of the amendments, and the remarks set forth below, the Applicants request reconsideration of the rejection of claims 1 through 18.

I. Paragraphs 2 and 3: Rejection Under 35 U.S.C. 102(e)

In paragraphs 2 and 3 of the Office Action, claims 1 through 14 and 16 through 18 were rejected under §102(e) as anticipated by Ohira. The Applicants respectfully traverse this rejection.

Of the claims rejected in paragraph 3 of the Office Action, claims 1, 9 and 17 are independent. Independent claim 1 requires an “a memory access width controller that controls said quantization controller such that bit allocation is controlled in relation to the number of bits of an access unit of said storage means.” Similarly, independent claim 9 requires, “a memory access width controller that applies bit allocation control to said quantization controller based on the number of bits of a memory access unit of said memory.” Independent claim 17 is a method claim corresponding to independent claims 1

and 9, and includes the similar requirement of “detecting a number of coded bits for every control unit of compression processing and controlling said number of coded bits so that said number of coded bits is in conformity with the number of bits of a memory access unit of a memory when said detected number of coded bits exceeds the number of bits of a memory access unit of said memory.”

The Office Action asserts that Ohira discloses these limitations. Specifically, the Office Action argues that the description of the compressing section in Ohira reads on independent claims 1, 9 and 17 of the present application, because Ohira teaches that “data in the compressing section 107a of Figure 18 is compressed based on the compression rate information 157 from the compression rate judging section 106, and the compression rate judging section [106] thereby provides the rate of compression in connection with the **storage capacity**, i.e., the number of bits, of the storage memory 103.” Office Action at 3-4 (emphasis added).

The Applicants disagree that Ohira anticipates independent claims 1, 9, and 17. It is respectfully pointed out that independent claims 1, 9, and 17 do not vary the rate of compression in connection with the number of bits of a storage memory as asserted in the Office Action. Rather, independent claims 1, 9 and 17 require controlling bit allocation, i.e., the number of coded bits, as a function of the number of bits of a *memory access unit*.

This distinction is most clearly illustrated in Figures 2 and 3 of the present specification. As illustrated in these Figures, M1 is the number of bits that can be processed by the memory access unit in one access cycle. Given the compression level indicated in Figure 2, the last M2 bits of block N3 cannot be accessed in the first memory cycle and a second memory access is required to retrieve (or store) these bits from (or to) memory.

The present invention recognizes and solves this problem of the prior art by taking into account during quantization the number of bits capable of being processed by the

memory access unit. As illustrated in Figure 3, once the member of bits of the memory access unit is taken into account, the three blocks N1, N2, and N3 of properly quantized data can all now be retrieved from (sent to) the memory in a single cycle.

The Office Action incorrectly equates Ohira's storage memory, with the memory access unit of the present application. The memory access unit provides access to a memory -- it is not the same as the memory itself. Likewise, the number of bits of an access unit of a storage means is completely separate and distinct from the number of bits of the storage unit itself. Ohira neither discloses nor suggests varying bit allocation, i.e., the number of coded bits, as a function of memory access unit of a memory. In fact, nowhere in Ohira is a memory access unit even mentioned.

In summary, Ohira fails to either disclose or suggest controlling bit allocation, i.e., the number of coded bits, as a function of the number of bits of an memory access unit of a memory, as required by claims 1, 9 and 17. As a result, the rejection of these claims under §102(e) should be withdrawn.

In addition, claims 2 through 8, 10 through 14, 16 and 18 each depend from, and include all the limitations of, one of independent claims 1, 9 or 17. Ohira fails to anticipate the dependent claims for the same reasons, discussed above, that Ohira fails to anticipate the corresponding independent claims. Thus, the rejection of dependent claims 2 through 8, 10 through 14, 16 and 18 under §102(e) should also be withdrawn.

II. Paragraph 4: Rejection Under §103(a)

In paragraph 4 of the Office Action, claim 15 is rejected under §103(a) over Ohira in view of Nakajima. The Applicants respectfully traverse this rejection.

Claim 15 is dependent on, and includes all the limitations of, independent claim 9. Consequently, for the same reasons discussed above with respect to claim 9 (see Section I, *supra*), Ohira fails to disclose or suggest "a memory access width controller that applies bit

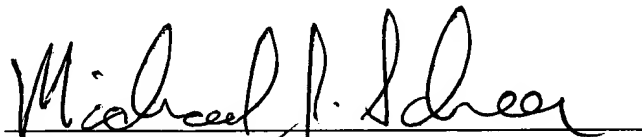
allocation control to said quantization controller based on the number of bits of a memory access unit of said memory,” as required by claim 15.

Moreover, Nakajima does not cure the deficiency of Ohira with respect to claim 15. Nakajima was not cited by the Office Action to cure the basic deficiencies in Ohira, but to disclose certain additional features, not included in independent claim 9, that were recited in dependent claim 15. Regardless of whether or not Nakajima does recite these additional features, the combination of Nakajima with Ohira remains deficient, and does not disclose or suggest each and every limitation of dependent claim 15. Thus, the Office Action has failed to establish a *prima facie* case of obviousness with respect to claim 15, and its rejection under 35 U.S.C. 103(a) should be withdrawn.

III. Conclusion

In light of all of the foregoing, it is respectfully submitted that this application is now in condition for allowance, and the early issuance of a notice of allowance is requested.

Respectfully submitted,

A handwritten signature in black ink, reading "Michael J. Scheer". The signature is written in a cursive style with a horizontal line underneath.

Michael J. Scheer
Registration No.: 34,425
DICKSTEIN SHAPIRO MORIN & OSHINSKY, LLP
1177 Avenue of the Americas
New York, New York 10036
Telephone: (212) 835-1400